

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,)	
)	
)	
Plaintiff,)	
)	
— v. —)	CIVIL ACTION NO.
)	1:14-cv-11550-PBS
GLENN BECK; THE BLAZE, INC.;)	
MERCURY RADIO ARTS, INC.; AND)	
PREMIERE RADIO NETWORKS, INC.)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION TO DISMISS THE COMPLAINT
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as “The Blaze, Inc.”), Mercury Radio Arts, Inc., and Premiere Radio Networks, Inc. (“Defendants”) move to dismiss the Complaint of Plaintiff Abdulrahman Alharbi in its entirety and with prejudice on the grounds that the Complaint fails to state a claim against Defendants. In support of their request, Defendants respectfully refer the Court to their Memorandum of Law, filed and served contemporaneously herewith.

WHEREFORE, Defendants respectfully request that the Court grant its Motion to Dismiss the Complaint in its entirety and with prejudice.

Dated: May 27, 2014

Respectfully submitted,

GLENN BECK, THEBLAZE INC.,
MERCURY RADIO ARTS, INC., and
PREMIERE RADIO NETWORKS, INC.,

By their attorneys,

GREENBERG TRAURIG, LLP

/s/ *Mark A. Berthiaume*

Michael J. Grygiel (Application for
admission *pro hac vice* pending)
Mark A. Berthiaume (BBO # 041715)
Zachary C. Kleinsasser (BBO # 664291)
One International Place
Boston, Massachusetts 02110
grygielm@gtlaw.com
berthiaumem@gtlaw.com
kleinsasserz@gtlaw.com
Tel: (617) 310-6000
Fax: (617) 897-0993

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing on May 27, 2014.

/s/ *Mark A. Berthiaume*

NY 243783425v1